

Reinhart Boerner Van Deuren s.c. P.O. Box 2965 Milwaukee. WI 53201-2965

1000 North Water Street Suite 1700 Milwaukee, WI 53202

Telephone: 414-298-1000 Facsimile: 414-298-8097 reinhartlaw.com

October 21, 2016

Mark A. Cameli Direct Dial: 414-298-8155 mcameli@reinhartlaw.com

ELECTRONICALLY FILED

Hon. Charles N. Clevert Jr. Federal Courthouse 517 East Wisconsin Avenue Milwaukee, WI 53202

Dear Judge Clevert:

Re: Rickey I. Kanter v. Loretta Elizabeth Lynch, et al.; Case No. 16-CV-1121

I write this letter on behalf of the parties in this action to advise the Court of a suggested manner for proceeding with this case in an effort to streamline its disposition.

It appears this matter is appropriate for a dispositive motion. The parties wish to submit motions, responses and replies, with the caveat noted below, and they propose the following briefing schedule:

- 1. Defendants' initial dispositive motions due by November 11, 2016;
- 2. Plaintiff's response/cross-motion due December 2, 2016;
- 3. Defendants' replies/responses due January 9, 2017; and,
- 4. Plaintiff's reply (if necessary) due January 20, 2017.

The parties agree to abide by Civil Local Rule 7(f) with respect to page limitations. Further, upon reviewing the submitted motions, each party reserves its right to move the Court for relief under FRCP 56(d) (presuming a good faith basis exists for requesting such relief) and further reserves its rights to object to such requested relief by an opposing party. If the Court grants the requested relief under Rule 56(d), the parties contemplate the Court will amend the above briefing schedule.

The Court is free to enter an Order consistent with the above without further notice to the parties, schedule a status conference to address this matter further, or otherwise advise the parties of any additional information it wishes to receive including a form of order to be entered.

Hon. Charles N. Clevert Jr. October 21, 2016 Page 2

Thank you for your consideration.

Yours very truly,

s/ Mark A. Cameli

Mark A. Cameli

35020814

cc Counsel of Record (via ECF):
Brian P. Keenan, Esq.
Colin T. Roth, Esq.
Michael L. Drezner, Esq.